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Attorney for Jerome Michael Bell

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEROME MICHAEL BELL,

Defendant.

Case No. 2:15-cr-00011-JCM-CWH

**Stipulation and Order to Extend
Deadline to Supplement Compassionate
Release (Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Jerome Michael Bell, and Jim Fang, counsel for the United States of America, that the deadline on which defendant must file his supplement in support of compassionate release is extended 45 days from the day of this filing, to on or before August 18, 2024.

This stipulation is entered into based upon the following reasons:

1. Counsel for Defendant was appointed to Mr. Bell to supplement his motion for compassionate release on December 28, 2023. (ECF No. 250).
2. According to Amended General Order 2020-06 In Re: Compassionate Release Requests Under the First Step Act, the FPD must file a supplement to the defendant's pro se motion within thirty days.
3. Currently, Mr. Bell's supplement to compassionate release is due July 4, 2024. (ECF No. 252).

- 1 4. At this time, Mr. Bell requires an additional 45 days to supplement his pro se motion
- 2 for compassionate release for the following reasons.
- 3 5. Defense counsel last spoke with Mr. Bell on May 13, 2024 (communication is
- 4 challenging due to frequent lockdowns). Counsel was made aware that Mr. Bell did
- 5 not receive his attorney mail and therefore Mr. Bell has not filled out documentation
- 6 necessary for defense counsel to move forward with supplementation of his motion
- 7 for compassionate release.
- 8 6. A second attempt at mailing documentation to Mr. Bell appears to have been
- 9 successful. Based on USPS tracking and return receipt, Beaumont USP accepted
- 10 attorney mail for Mr. Bell on June 5, 2024.
- 11 7. However, Mr. Bell has not been responsive to the attorney-client mail. Counsel has
- 12 not had communication with Mr. Bell.
- 13 8. Further communication with the client who is detained is also required to complete
- 14 Mr. Bell's supplement to motion for compassionate release, including exhaustion of
- 15 the administrative remedy. Counsel notes that obtaining communication with
- 16 penitentiary inmates may be difficult due to institutional security and frequent
- 17 lockdowns. Counsel needs further communication with Mr. Bell to move forward
- 18 with filing a supplement to compassionate release.
- 19 9. The parties agree to the extension of time to 45 days.
- 20 10. This is the second request for extension of time.
- 21
- 22

23 Dated this 2nd day of July 2024.

24 Respectfully Submitted,

25
26 /s/ Jim Fang
27 JIM FANG, ESQ.
28 Assistant United States Attorney

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Counsel for Jerome Michael Bell

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Order

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant's supplementation in support of compassionate release shall be due on or before August 18, 2024, the Government's response will be due 14 days from the date the supplement is filed, and Defendant's counsel will have seven days following submission of the response to file a reply.

DATED: July 3, 2024



THE HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE